



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAY 11 2017

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patsy Smolik
EHS Corporate Engineer
Sanmina
13000 South Memorial Parkway
Huntsville, Alabama 35803

SUBJ: RCRA Compliance Evaluation Inspection
Sanmina SCI
EPA ID # ALD983166257

Dear Mrs. Smolik:

Enclosed is a copy of the U.S. Environmental Protection Agency inspection report documenting the results of the March 14, 2017, inspection of Sanmina SCI located at 13000 South Memorial Parkway, Huntsville, Alabama. This was an EPA compliance evaluation inspection (CEI) for the purpose of evaluating the facility's compliance with the applicable Resource Conservation and Recovery Act (RCRA) regulations.

A copy of this report has been forwarded to the Alabama Department of Environmental Management (ADEM) for follow-up.

If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Alan A. Annicella".

Alan A. Annicella
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

cc: Bailey Dykes, Industrial Hazardous Waste Program, ADEM Land Division



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Vernon H. Crockett
Chief, Industrial Hazardous Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2059

SUBJ: RCRA Compliance Evaluation Inspection
Sanmina SCI
EPA ID Number: ALD983I66257

Dear Mr. Crockett:

On March 14, 2017, a U.S. Environmental Protection Agency compliance evaluation inspection was conducted at Sanmina SCI, located in Huntsville, Alabama, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

Enclosed is a copy of the EPA inspection report. Apparent violations of RCRA were discovered. Please follow-up with Sanmina SCI to ensure violations have been addressed.

If you have any questions regarding this matter, please contact Paula Whiting, of my staff, by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Alan A. Annicella".

Alan A. Annicella
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

RCRA Inspection Report

1) Inspector and Author of Report

Paula A. Whiting
Environmental Engineer
U.S. Environmental Protection Agency, Region 4
Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-9277

2) Facility Information

Sanmina SCI
13000 South Memorial Parkway
Huntsville, Alabama 35803
Madison County
EPA ID: ALD983166257

3) Responsible Official

Patsy Smolik
EHS Corporate Engineer
Sanmina SCI
13000 South Memorial Parkway
Huntsville, Alabama 35803

4) Inspection Participants

Patsy Smolik	Sanmina SCI
Bailey Dykes	ADEM Land Division
Paula Whiting	US EPA Region 4 Atlanta

5) Date and Time of Inspection

March 14, 2017 at 9:30 a.m. CDT

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

ADEM Administrative Code 335 Division 14

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a) [40 C.F.R. § 262.34(a)], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month is a Large Quantity Generator (LQG) and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.03(5)(a)1.-6. [40 C.F.R. § 262.34(a)(1)-(4)] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(c)1. [40 C.F.R. § 262.34(c)(1)], a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.03(5)(a) [40 C.F.R. § 262.34(a)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.03(5)(c)1.(i)-(ii) [40 C.F.R. § 262.34(c)(1)(i)-(ii)] (hereinafter referred to as the “SAA Permit Exemption”).

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Sanmina SCL EPA ID# ALD983166257 with the applicable RCRA regulations.

8) Facility Description

The Sanmina SCL, Huntsville, Alabama (Sanmina, facility, or Huntsville location) is a manufacturer of communication and infrastructure, defense, and aerospace equipment. Industrial and semiconductor systems, medical, enterprise computing and storage solutions data are all aspects of Sanmina which services multimedia, automotive and technology sectors. The Huntsville location assembles circuit boards and electronic components for blood glucose monitors, blood pressure monitors, missiles, helicopters, etc.

The Huntsville location has been in operation since 1984 as Sanmina, previously as GTE beginning in 1966. The facility is located on 48 acres with the production area located in two buildings. Plant 437 houses the Defense and Aerospace production, and Plant 438 houses the commercial medical and automotive production. The facility has a production area of 684,000 square feet. The facility has 1,441 employees, of which 39 of them handle hazardous waste. The facility operates 21 hours a day in three shifts for five days a week and, only two shifts on the weekends.

The Sanmina's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated April 12, 2016, characterized the facility as a large quantity generator (LQG) of hazardous waste.

Currently, Sanmina may generate hazardous waste, used oil, universal wastes (such as spent batteries and certain types of lamps), waste solvent, spent aerosol cans, paint waste and other wastes which

include EPA Waste Codes D001, D002, D008, D009, D011, D035, F003 and F005.

9) Previous Inspection History

This facility was previously last inspected on July 28, 2016 by ADEM. One issue was found and returned to compliance on August 13, 2016.

10) Findings

Upon arriving at Sanmina, the inspectors signed in at the reception desk before being escorted around the facility. The inspectors presented their credentials to Ms. Smolik at 9:30 a.m. CDT.

A brief explanation for the purpose of the inspection was given, as well as an introduction of the ADEM and EPA inspectors. The inspectors requested a description of the facility operations. The inspectors then performed a walk-through inspection of specific areas in the facility. The following is a description of the observations made during the walk-through.

10.1 Plant 438 Hazardous Waste Storage Area

The hazardous waste storage area was an external, fenced-in, concrete pad with curbing (Pictures 1-5). The inspectors observed the following containers within the area:

- Sixteen black 5-gallon containers of lead solder, not labeled or dated;
- Thirty-eight green 5-gallon containers of non-lead solder, not labeled or dated. Ms. Smolik explained that the containers of lead solder and non-lead solder were excluded by ADEM, which allows the facility to send the waste material for recycling.
- One 5-gallon container of alkaline batteries marked as universal waste;
- Three 55-gallon drums of polychlorinated biphenyl (PCB) waste with capacitors. The inspectors recommended that a waste profile be obtained from the disposal company.
- Eight 55-gallon drums of waste solvent, solder paint and liquid flammable;
- One 55-gallon drum of corrosive flux;
- One 55-gallon of non-regulated soap water from the wash process
- Two yellow spill kits; and
- Three 55-gallon drums of pig socks.

Unless otherwise stated, the containers were observed closed, labeled and dated.

Inside the warehouse were eight fiberboard Gaylord boxes of waste solder wipes (Pictures 6-7). The inspectors observed that one box was labeled and the remaining boxes were not. Ms. Smolik explained that the waste solder wipes are hazardous waste but the facility was given an exclusion by ADEM. In an October 15, 2014 letter to Conexsus LLC (EPA ID TXR000000034) in Terrell, TX, in regard to the Management of Lead-Contaminated Materials Recycled to Produce Reducing Agent Coke Substitute (RACS), ADEM stated that the RACS was feedstock.

An open 5-gallon container with hydraulic oil product labeling was discarded in a 55-gallon drum (Pictures 8-10). The work area where the container was found was not active and there were no personnel available to explain the contents of the container and why it had been discarded.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

10.2 Plant 438 Maintenance Room

The maintenance room was a standalone building. Inside the building, the inspectors observed a spent aerosol can that was not RCRA empty discarded in the garbage (Pictures 11-13). Three yellow flammable cabinets were used to store paint products. The first cabinet contained five 5-gallon containers of paint (Pictures 14-15). One of the containers on the bottom shelf was observed rusted on the top. The inspectors recommended that the facility determine whether the container was still in use or if it should be discarded.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

The second cabinet contained one-gallon containers of paint. No waste was observed in this cabinet. The third cabinet contained aerosol paint cans. The inspectors observed three cans without nozzles, two cans with nozzle tips that needed replacing and two aerosol cans dated December 29, 2005 (Pictures 16-19). The inspectors recommended that the facility determine whether the containers were still in use or if they should be discarded.

A red flip-top flammable container of solvent and paint equipment was observed on a bench (Pictures 20-21). The inspectors asked how often the container was emptied or cleaned out but Ms. Smolik was not aware of this information. The inspectors recommended determining when the spent solvent is discarded and where.

Outside the maintenance room, the inspectors observed a bin with discarded metal and empty paint containers near the building, and on the side of the building was an open tank (Pictures 22, 29). The inside of the tank and near the tank drain was covered in white paint. Five 5-gallon containers and two coffee containers of paint waste was observed next to the open tank (Pictures 23-25). In an April 5, 2017 email to ADEM, Ms. Smolik provided the safety data sheet (SDS) for a coating called UH 150 FL WH 1200-0100V. In Section 13 – Disposal Considerations, the SDS states “*Disposal of surplus and non-recyclable products via a licensed waste disposal contractor.*” Thus, a waste determination is needed to determine whether the paint left sitting outside beside the tank is hazardous.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

Next to the tank is a flocculation basin, also called a sump, that receives the facility wastewater (Pictures 26-28). At the time of the inspection, the inspectors observed a cloudy white residue in the wastewater and smelled solvent emitting from the basin. The tank had paint residue in the drain from

paint being poured into the tank. Ms. Smolik confirmed via email that the basin receives wastewater from the facility and sends it to the local sewer. The inspectors advised if paints and/or solvents are being released into the basin that a waste determination of the flocculation basin waste water should be conducted.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

10.3 Plant 438 Supply Room

Universal waste disposal records were reviewed. Mr. Malcolm Readus, Purchasing Assistant, provided the current disposal records. The universal waste lamps were picked up by Veolia ES Technical Solutions, LLC (EPA ID FL0000207449) located in Tallahassee, Florida on January 22, 2017.

Mr. Readus then took the inspectors to the supply room where the spent lamps were stored (Pictures 30-37). The inspectors observed four shelves with eleven 4-foot boxes, six 2-foot boxes, one carton of spent ballasts, seven loose spent high intensity discharge (HID) lamps stored with the ballasts and broken lamp shards on the floor beside the shelving. One of the 4-foot boxes was open, and all the containers did not have any accumulation start dates. Mr. Readus explained that the broken lamps were stored and shipped out with the universal waste lamps instead of as hazardous waste. Thus the broken lamps were not placed in a separate container from the universal waste lamps or labeled as "Hazardous Waste."

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)4. [40 C.F.R. § 262.34(a)(4)], which incorporates ADEM Admin. Code r. 335-14-6-.03(2) [40 C.F.R. § 265.31], and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. Broken lamp shards were on the floor beside the shelving.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [40 C.F.R. § 261.2], must determine if broken fluorescent lamps are a hazardous waste following the methods articulated in ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

Pursuant to ADEM Admin. Code r. 335-14-11-.02(4)(d) [40 C.F.R. § 273.13(d)], a small quantity handler of universal waste (SQHUW) must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(e) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamps."

Pursuant to ADEM Admin. Code r. 335-14-11-.03(6)(a) and (c) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

10.4 Plant 437 Satellite Accumulation Area

The Plant 437 satellite accumulation area (SAA) is a standalone building outside of the production area. At the time of the inspection, the inspectors observed the following:

- One black 55-gallon drum of spent aerosol can residue and a can puncture system on top of the drum (Picture 38);
- One black 55-gallon drum of waste solvent/paint related waste, closed, labeled and dated March 8, 2017 (Pictures 38-39);
- One black 55-gallon drum of solder wipes, closed, labeled and dated October 2016 (Picture 40);
- One black 55-gallon drum of solder paste to be recycled (Picture 40);
- One open green spill kit (Picture 40);
- One black 55-gallon drum of waste analdite/aradur mixture closed, labeled and dated October 24, 2016, that is almost full (Picture 40);
- One blue 30-gallon drum of lead acid batteries labeled as universal waste, closed and dated August 10, 2016 (Pictures 40, 42);
- One blue 5-gallon carboy of Uresolve 411 waste (Picture 41);
- One blue 55-gallon of corrosive waste closed, labeled D001 and D002 and dated July 27, 2016 (Picture 41);
- One yellow flammable storage cabinet containing (Pictures 43-47):
 - One 5-gallon container of mercury switches closed, labeled and dated January 26, 2016;
 - One 5-gallon container of cracked lithium batteries closed, labeled and dated February 16, 2016;
 - One 5-gallon container of non-hazardous leaking alkaline batteries coated with heavy mineral oil;
 - One non-hazardous one-gallon container of P268 that is leaking and stored inside a plastic bag;
 - One plastic bag containing non-hazardous P268 contaminated absorbent material and peanuts;
 - One 5-gallon container of waste RTV-608 closed, labeled and dated December 15, 2015;
- One yellow flammable storage cabinet containing expired and/or discarded laboratory chemicals in original packaging and were not dated (Pictures 48-51). Mr. Keith Bush, Chemical Control Technician, stated that he had inherited the responsibility of the cabinet a month previous and anticipated lab packing the expired chemicals and scheduling the shipment for disposal. Mr. Bush stated he did not know when the chemicals were placed in the cabinet and how long the expired chemicals had been stored prior to his involvement.

Unless otherwise stated all the containers were closed, labeled and dated.

The inspectors explained because the facility did not know how long the expired chemicals had been stored in the cabinet, the facility needed to send off the expired laboratory chemicals in the next shipment.

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(b) [40 C.F.R. § 262.34(b)], a LQG who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of ADEM Admin. Code rr. 335-14-5 and 335-14-6 [40 C.F.R. Parts 264, 265, and 267] and the permit requirements of ADEM Admin. Code r. 335-14-8 [40 C.F.R. Part 270].

Also, the inspectors recommended for all the SAA containers in the first flammable storage cabinet be sent off for disposal. These containers had been stored since January 2016 and no additional waste had been added.

10.5 Plant 437 Production Area

Plant 437 Production Area has restricted access due to sensitive products that are made under government contracts. Solder dross and waste wipes containers were observed on the production floor.

At the time of the inspection, the inspectors toured the coating operations area where spent solvent was generated in the laboratories and stored in 5-gallon containers in the laboratory flammable storage cabinets (Pictures 54-55). Mr. Bush explained that there are ten flammable storage cabinets throughout the plant that were used to store new solvent and waste solvent. The inspectors observed metal lids on top of the waste solvent container that did not fit properly and did not prevent the solvent from volatilizing from the container. Thus, the containers were not closed. The inspectors explained that the lids should be replaced with properly fitting lids that would prevent the solvent from volatilizing and spills, if the container should be knocked over.

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(c)1.(i) [40 C.F.R. § 262.34(c)(1)(i)], which incorporates ADEM Admin. Code r. 335-14-6-.09(4)(a) [40 C.F.R. § 265.173(a)], and is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed when waste is not being added or removed.

An aerosol can SAA collection container and a universal waste battery container were observed in the DAS office area (Pictures 58-59). The containers were closed and labeled. No issues were observed in this area.

10.6 Plant 438 Boiler Room

The inspectors observed a 250-gallon used oil tote in the boiler room (Pictures 56-57). The tote was closed and labeled. No issues were observed in this area.

Records Review

After the walkthrough, the inspectors requested the training records, the Contingency Plan, inspection logs, waste profiles, waste minimization plan and the 2014-2016 hazardous, non-hazardous, used oil and the universal waste manifests. The generator status notification (EPA Form 8700-12) was last updated April 12, 2016.

The training records for the 39 employees that manage the hazardous waste were requested. The job description and duties were reviewed. Thirty-eight of the employees received 8-Hour Hazardous Material Training by Emergency Response Services, Inc. located in Scottsboro, AL on September 6-8, 2016. At the time of the inspection, Mr. Malcolm Readus, who handles the universal waste lamps and signs the bills of lading, had not received any training for either hazardous waste or universal waste.

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a) [40 C.F.R. § 262.34(a)(4)], which incorporates ADEM Admin. Code r. 335-14-6-.02(7) [40 C.F.R. § 265.16(a-d) and is a condition of the LQG Permit Exemption, (a) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the regulations; (b) Facility personnel must complete this training within six months of being hired; (c) Facility personnel must take part in an annual RCRA refresher training; and (d) the generator must maintain training records that include, among others: the job title, written description, and name of each employee filling the job for each position related to hazardous waste management; and documentation that the training required has been given to and completed by Facility personnel.

The inspectors requested and reviewed the Contingency Plan Revision D00, dated August 31, 2016. The plan included an emergency contact list and contact home addresses, a fire extinguisher list, an evacuation map and a list of emergency response equipment. Documentation (i.e., green return receipt cards) that copies of the contingency plan were provided to the local emergency response agencies (i.e., fire, police, hospital) was not available. In addition, the previous EHS Engineer, Mr. Greg Bryant was listed as contact. Mr. Bryant had recently left the company.

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a) [40 C.F.R. § 262.34(a)(4)], which incorporates ADEM Admin. Code r. 335-14-6-.04(5) [40 C.F.R. § 265.53(b)], and is a condition of the LQG Permit Exemption, a copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a) [40 C.F.R. § 262.34(a)(4)], which incorporates ADEM Admin. Code r. 335-14-6-.04(5) [40 C.F.R. § 265.54(d)], and is a condition of the LQG Permit Exemption, a generator is required to review and amend its contingency plane, if necessary, whenever the list of emergency coordinator changes.

The inspectors reviewed the weekly inspection records from 2014 – 2016 for the HWSA.. The inspectors explained that the inspection form needed to be updated to include the universal waste storage areas in the hazardous waste storage area inspection records.

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)1.(i) [40 C.F.R. § 262.34(a)(1)(i)], which incorporates 335-14-6-.09(5) [40 C.F.R. § 265.174], and is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect areas where containers are stored looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

Waste profiles were reviewed for SMT Wipes dated March 22, 2011; paint waste dated June 11, 2015; waste flux dated June 11, 2012; Araldite CW 5801-1 US mixed dated May 20, 2014; Aradur harder mixed with IPA dated May 15, 2014; and paint waste solid dated July 22, 2016. The inspectors observed that all the profiles reviewed had EPA waste codes and were considered hazardous wastes.

The Waste Minimization Plan was requested. However, Mr. Bryant before he left was drafting the plan, but had not completed it.

Pursuant to ADEM Admin. Code r. 335-14-3-.04(1)(e), a generator who transports hazardous waste or offers hazardous waste for transportation off-site must have a program in place to reduce the volume and toxicity of such waste to the degree determined by the generator to be economically practicable. A generator must document this program in a written waste minimization plan.

Hazardous and non-hazardous manifests were reviewed for 2014-2016. Hazardous wastes were shipped to Tradebe Treatment and Recycling (EPA ID TND000772186) in Millington, TN; and Cookson Electronics (Alpha) (EPA ID PAD089352983) in Altoona, PA. Manifest 015540439JJK dated January 5, 2017 was missing the signed Designated Facility to Generator form. The land disposal restriction forms were reviewed.


Pursuant to ADEM Admin. Code r. 335-14-3-.04(3)(a)1.-2. [40 C.F.R. 264.42 (a)(1-2)], a generator, who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste. (2) A generator must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

Non-hazardous waste was shipped to Veolia ES Technical Solutions, LLC (EPA ID WID988566543) in Port Washington, WI.

11) Summary

The inspectors conducted the exit meeting with Mrs. Smolik. During this meeting, the EPA and ADEM presented the preliminary results of the inspection. Sanmina was inspected as a large quantity generator of hazardous waste. At the time of the inspection, Sanmina did not appear to be in compliance with some requirements of RCRA.

12) Signed




Paula A. Whiting,
Environmental Engineer

5/10/17

Date

Concurrence



Alan A. Annicella, Chief
Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

5/11/17

Date

ATTACHMENT A

SANMINA SCI

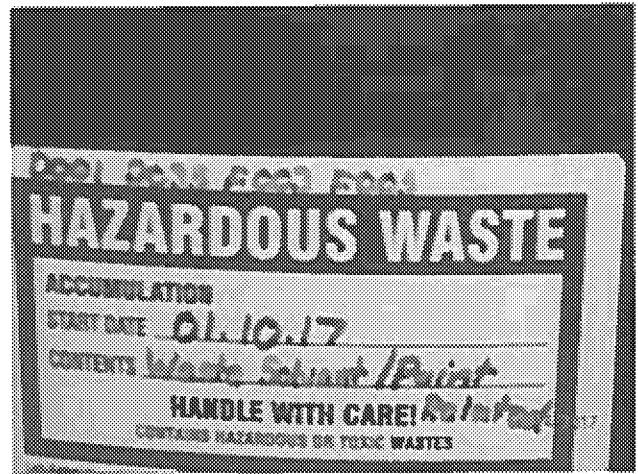
HUNTSVILLE ALABAMA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

MARCH 14, 2017



Picture 1 – HWSA lead solder waste to be recycled



Picture 4 – HWSA paint related waste label



Picture 2 – HWSA



Picture 5 – HWSA flux waste and non haz soapy water



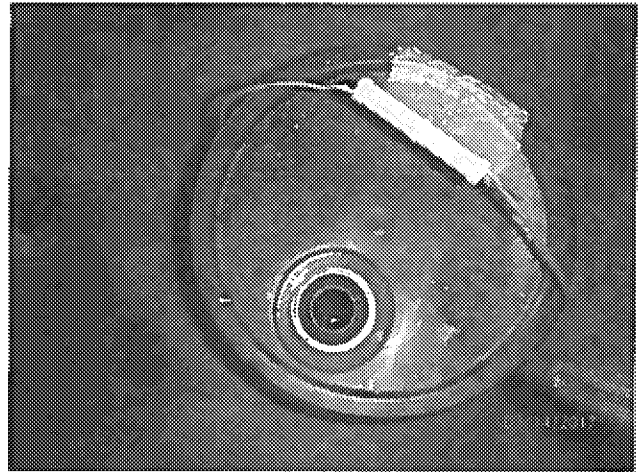
Picture 3 – HWSA



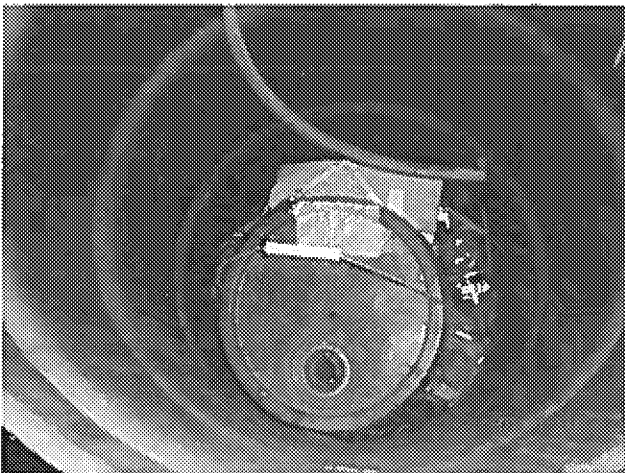
Picture 6 – Warehouse Gaylord boxes of solder wipes to be recycled



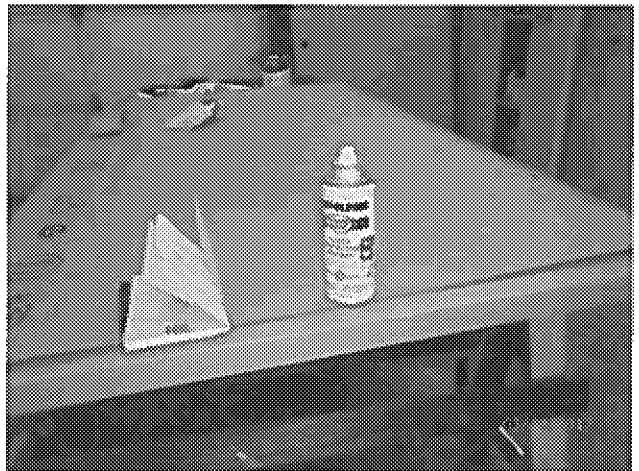
Picture 7 -- Warehouse Gaylord boxes of solder wipes to be recycled



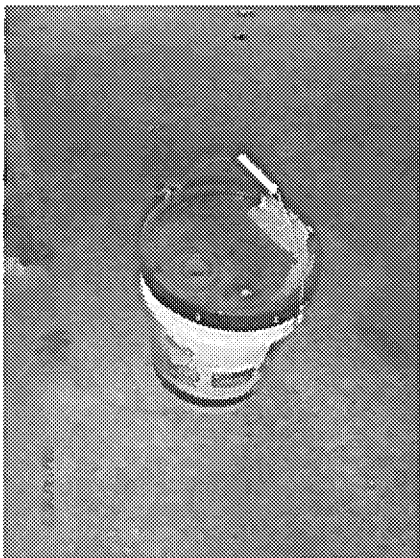
Picture 10 -- Warehouse container of discarded hydraulic oil



Picture 8 -- Warehouse container of discarded hydraulic oil



Picture 11 -- Maintenance Room discarded paint can from the garbage



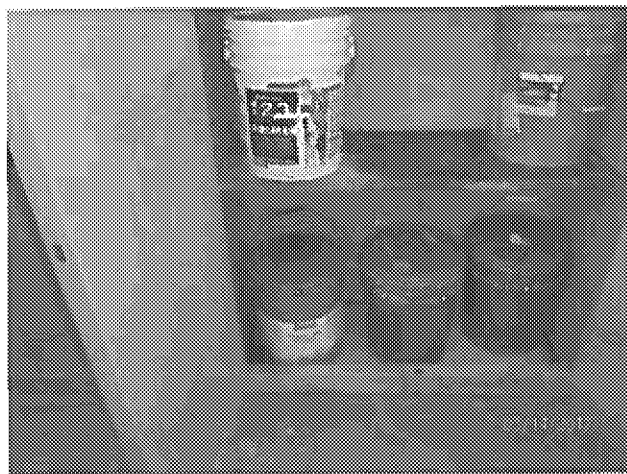
Picture 9 -- Warehouse container of discarded hydraulic oil



Picture 12 -- Maintenance Room discarded paint can from the garbage



Picture 13 -- Maintenance Room discarded paint can in the garbage



Picture 14 -- Maintenance Room flammable cabinet with a rusted paint container



Picture 15 -- Maintenance Room flammable cabinet with a rusted paint container



Picture 16 -- Maintenance Room aerosol cans missing nozzles



Picture 17 -- Maintenance Room aerosol cans missing nozzles



Picture 18 -- Maintenance Room aerosol cans missing nozzles



Picture 19 — Maintenance Room old aerosol cans dated 2005



Picture 22 — Outside Tank covered in paint residue



Picture 20 — Maintenance Room solvent and paint brushed in a flammable flip top container



Picture 23 — Outside Tank with containers of paint waste



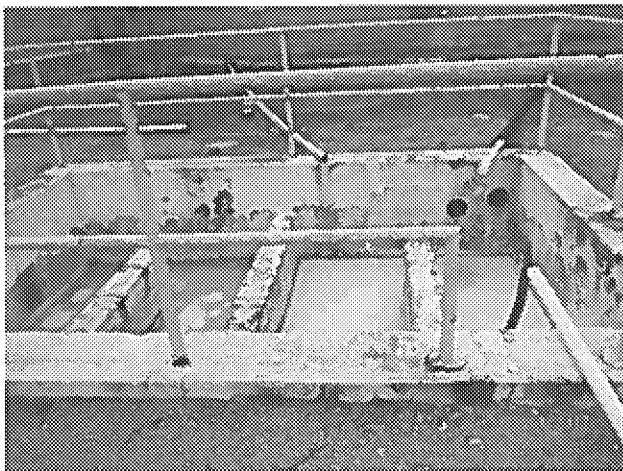
Picture 21 — Maintenance Room solvent and paint brushed in a flammable flip top container



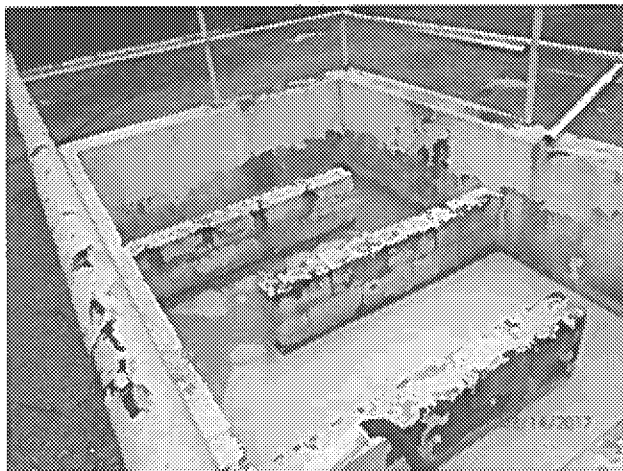
Picture 24 — Outside Tank with containers of paint waste



Picture 25 – Outside Tank with containers of paint waste



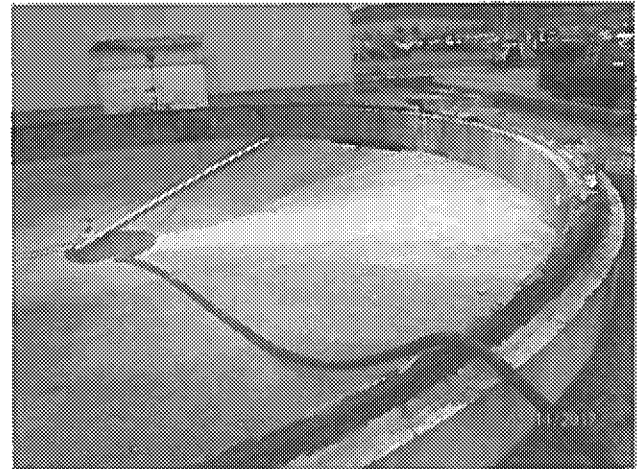
Picture 26 – Sump near Outside Tank with paint residual and solvent smell



Picture 27 – Sump near Outside Tank with paint residual and solvent smell



Picture 28 – Sump near Outside Tank with paint residual and solvent smell



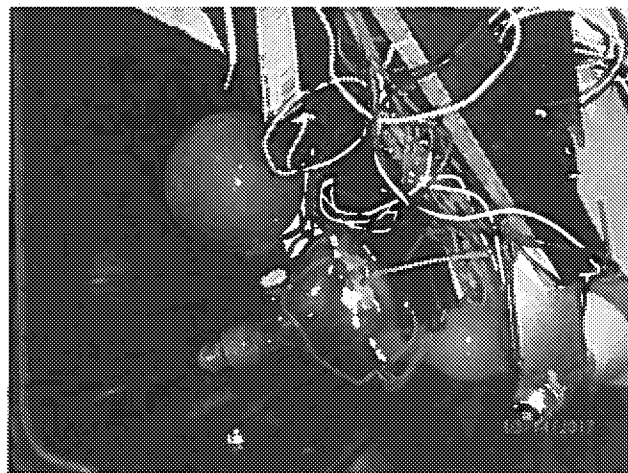
Picture 29 – Outside Tank with paint residue



Picture 30 – Supply Room universal waste storage



Picture 31 – Supply Room universal waste storage open container



Picture 34 – Supply Room universal waste storage container



Picture 32 – Supply Room universal waste storage



Picture 35 – Supply Room broken fluorescent lamps on the ground



Picture 33 – Supply Room universal waste storage



Picture 36 – Supply Room broken fluorescent lamps on the ground



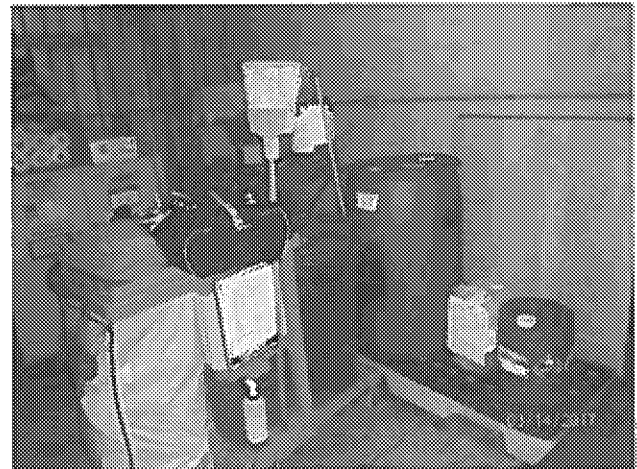
Picture 37 -- Supply Room universal waste storage containers on upper shelf



Picture 40 -- Plant 437 DAS SAA



Picture 38 -- Plant 437 DAS SAA aerosol can puncture system and paint related waste



Picture 41 -- Plant 437 DAS SAA



Picture 39 -- Plant 437 DAS SAA paint related waste



Picture 42 -- Plant 437 DAS SAA UW lead acid container



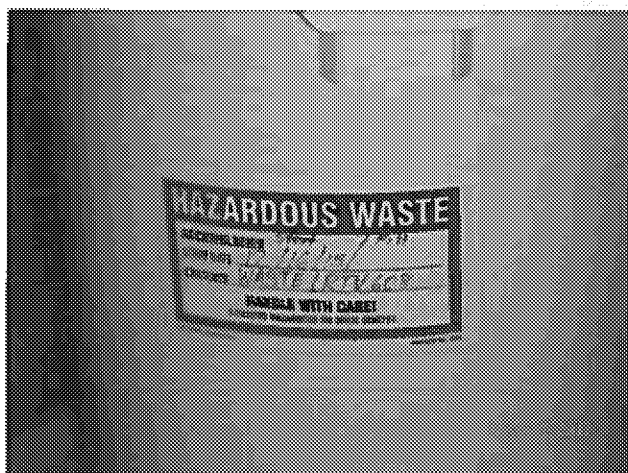
Picture 43 – Plant 437 DAS SAA HW battery containers



Picture 46 – Plant 437 DAS SAA waste RTV 608



Picture 44 – Plant 437 DAS SAA flammable storage cabinet with battery waste and P268 waste



Picture 47 – Plant 437 DAS SAA waste RTV 608



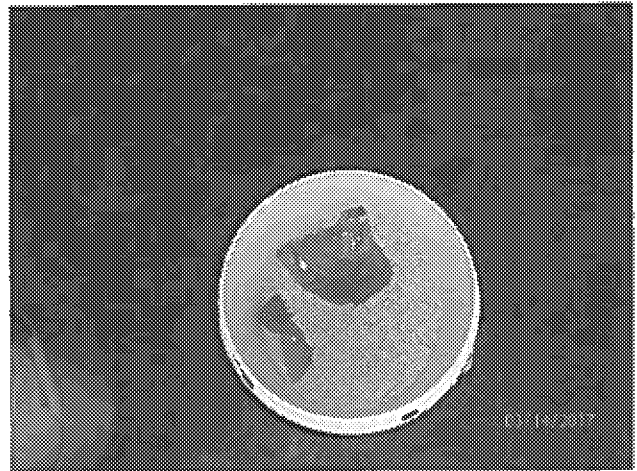
Picture 45 – Plant 437 DAS SAA flammable storage cabinet with alkaline battery waste



Picture 48 – Plant 437 DAS SAA flammable cabinet of expired chemicals



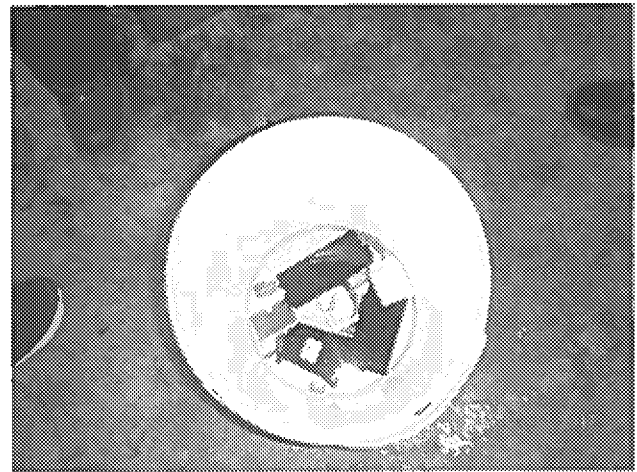
Picture 49 – Plant 437 DAS SAA flammable cabinet of expired chemicals



Picture 52 – Plant 437 DAS SAA flammable cabinet with leaking mercury batteries container



Picture 50 – Plant 437 DAS SAA flammable cabinet of expired chemicals



Picture 53 – Plant 437 DAS SAA flammable cabinet with leaking lithium batteries container



Picture 51 – Plant 437 DAS SAA flammable cabinet of expired chemicals



Picture 54 – Plant 437 DAS flammable cabinet waste container with a loose lid



Picture 55 – Plant 437 DAS flammable cabinet waste container with a loose lid



Picture 56 – Boiler Room used oil tote



Picture 57 – Boiler Room used oil tote label



Picture 58 – Aerosol collection container and UW battery container



Picture 59 – Aerosol collection container and UW battery container